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February 19, 2021

DAVID BLOOM DIRECT: 914.449.1085 DBLOOM@KBRLAW.COM

VIA EMAIL imerson@mersonlaw.com ccarlo@mersonlaw.com

Merson Law, PLLC Attorney(s) for Plaintiff 150 East 58th Street, 34th Floor New York, NY 10155

Re: John Doe v. Woods Services, Inc., et al.

Case No.: 20-cv-06129-WFK-RER

Our File No.: 508.583

Counselors:

As you know, this office represents the defendants, Woods Services, Inc., and as successor by merger to the former Crestwood Services, Inc. in the above-referenced matter. Enclosed herewith please find the defendants' Notice of Motion, the Declaration of David Bloom, Esq. with Exhibit "A", the Declaration of Simon Kimmelman, and the accompanying Memorandum of Law dated February 19, 2019, submitted in support of defendants' motion to dismiss.

In accordance with the Court's directives, the moving defendants will electronically file the within motion once it is fully briefed.

Very truly yours,

KAUFMAN BORGEEST & RYAN LLP

David Bloom (DB1918)

Encl.

NEW YORK CITY WESTCHESTER LONG ISLAND NEW JERSEY LOS ANGELES

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VIA ECF CC:

Judge William F. Kuntz, II
United States District Court for the Eastern District of New York

225 Cadman Plaza East Brooklyn, New York 11201

David Bloom

From:

David Bloom

Sent:

Friday, February 19, 2021 10:24 AM

To:

'jmerson@mersonlaw.com'; 'ccarlo@mersonlaw.com'; 'scantos@mersonlaw.com'

Cc:

Steven D. Weiner; Christina N. Langella

Subject:

Attachments:

Doe v. Woods Services, Inc., EDNY Case No. 20-cv-06129-WFK-RER -- motion to dismiss cvr ltr to TT with motion papers 2.19.21.pdf; Doe v. Woods Notice of Motion to dismiss

2.19.21.pdf; DB Declaration in support 2.19.21.pdf; Simon Kimmelman Declaration in

support of MTD.PDF; Doe v. Woods Memorandum of Law in support MTD.PDF

Counselors:

Attached please find defendants' motion to dismiss. As per our cover letter and in accordance with the judge's directives, our papers will be filed on ECF once the motion is fully briefed.

Regards, David

David Bloom I KAUFMAN BORGEEST & RYAN LLP 200 Summit Lake Drive I Valhalla, NY 10595 direct: 914.449.1085 I fax: 914.449.1100 vcard I email I website